FMLA IN THE HEALTH CARE INDUSTRY:

How to administer leave in this unique space

WHITEPAPER

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When was the last time you scheduled a medical treatment only to have that appointment postponed by the health care provider? Even if you scheduled it weeks in advance, it might still end up being rescheduled.

The reasons for this can vary, but sometimes, the health care provider isn't available at the original time. Even doctors, nurses, and other staff take time off. Sometimes they take time off for reasons that qualify as job-protected leave under the federal Family and Medical Leave Act (FMLA).

The 24/7 work schedules, frequent overtime hours, and industry demands can make administering FMLA leave a unique challenge for an HR professional working in health care. Read on to learn more about navigating FMLA leave for health care workers.

FMLA BASICS

The FMLA, which applies to all public employers and private employers with 50 or more employees, entitles eligible employees to job-protected, unpaid leave for qualifying reasons.

To be eligible to take FMLA leave, employees must:

- Have worked for the employer for at least 12 months (need not be consecutive),
- Worked at least 1,250 hours in the 12 months before leave is to begin, and
- Work at a location with at least 50 company employees within 75 miles.

Eligible employees may take up to 12 weeks of FMLA leave in a 12-month period for the following qualifying reasons:

- For their own serious health condition;
- To care for a spouse, parent, or child with a serious health condition;
- For the birth and to care for a child;
- For the adoption or foster care placement and care for a child; and
- For qualifying exigencies due to a family member's military duty.

Eligible employees may also take up to 26 weeks of FMLA leave to care for a family member with an injury or illness related to military duty.

The leave may be taken:

- Continuously in one large chunk of time, including all 12 weeks;
- On a reduced schedule basis, where an employee's regular workweek or workday is reduced; or
- Intermittently, where an employee takes leave in small increments, even if the need for leave is unforeseeable.

In many workplace settings, especially in health care, leave can pose a scheduling challenge, as the work still needs to get done. The FMLA is an employee entitlement law, meaning if employees qualify for FMLA leave, they have a right to take it for a qualifying reason. Employers may not claim that the leave would pose a hardship on the business. It's up to the employer to figure out how to manage the workload.

HEALTH CARE INDUSTRY CHALLENGES

In some industries, if an employee is on leave, product output might not be met. In the health care industry, however, an employee's absence can have a negative effect on patient care. Given the stress and hazards in the industry, health care employees generally have a high rate of FMLA leave.

Adequate coverage

Yet, health care employers (hospitals, clinics, nursing homes, etc.) must be able to schedule enough qualified employees to meet patients' needs while complying with applicable health care standards. On top of that, budgets need to be managed, and labor costs are usually a large line item in any company's budget. In health care, however, Medicare/Medicaid and insurance coverage also needs to be considered.

Because FMLA-eligible employees may take unforeseeable intermittent leave, this is always a challenge in any industry. When an employee suddenly calls in, another employee might need to step into that role. In health care, however, finding someone to cover for an employee on FMLA leave is seldom easy, as the person filling in must have the appropriate credentials.

Staff shortages

A current shortage of health care professionals adds to this challenge. In February 2023, the U.S. Senate held a full Health, Education, Labor, and Pensions committee hearing examining health care workforce shortages.

Nurses make up the majority of the health care workforce, and the average age of U.S. nurses today is 54 years old. Many health care workers are growing older, with many practitioners approaching, or even practicing beyond, retirement age.

Given this environment, having additional staff on hand to fill in for someone who suddenly needs FMLA leave is sometimes not an option. Therefore, some treatments and appointments get delayed.

STAFFING AGENCIES

Given such shortages, many health care organizations are turning to labor from staffing agencies. In such situations, the staffing agency and the health care company are seen as joint employers for purposes of the FMLA. That means that time spent working for a company assigned through a staffing agency is to be counted toward a worker's 12 months and 1,250 hours of eligibility.

Such temp employees are also to be counted toward the 50-employee threshold employers need to meet to be covered by the law.

SCHEDULES

Employers in many industries have various work schedules, and health care is no exception; it is a 24/7 operation. According to the Centers for Disease Control and Prevention (CDC), shift work and long hours put nurses at risk for making patient-care errors.

Health care providers might work any of the following types of schedules:

- **Three 12-hour shifts per week:** This schedule is common for providers who work in hospitals, long-term care facilities, and other health care facilities that serve patients 24 hours a day.
- **Four 10-hour shifts per week:** This is a less common schedule that may occur in hospitals, private practices, and medical clinics.

- **Five eight-hour shifts per week:** This traditional workweek schedule is common in schools, private practices, and medical clinics.
- **PRN:** PRN is an acronym for the Latin "pro re nata" which basically means "as needed." PRN practitioners work as needed and do not have a set schedule. They might have agreements with several hospitals or facilities that will call them when there is a staffing shortage.

When it comes to the FMLA, employees are entitled to 12 of their workweeks of leave. Employees who work three 12-hour shifts per week are entitled to 12 of those workweeks. Generally, when an employee takes FMLA leave in full-week increments, employers may count only the weeks.

Example: *If a doctor begins FMLA leave on Monday, May 8, the 12 weeks of leave would run until July 31.*

If, however, an employee takes intermittent leave, the actual workweek is the basis of calculating how many hours of FMLA leave an employee may take.

Example: *If a therapist normally works 45 hours per week, that results in 540 hours of FMLA leave. If an employee works 36 hours per week, that results in 432 hours of FMLA leave.*

Obviously, many practitioners end up working overtime due to shortages, such as when employees take leave.

Other health care workers can have varying schedules. (e.g., 7 days on and 7 days off). The FMLA does not provide a lot of detail on this, but a Wage and Hour Division (WHD) representative indicated that you do not count days the employee would not otherwise be off. With a 7-days-on-and-7-days-off schedule where an employee takes continuous FMLA leave, the 12 weeks would be the weeks that they would work, so you would not count the week that the employee is not otherwise working.

> *Intermittent leave is the top type of leave in the hospital system.*
>
> *(Wisconsin Hospital Association - https://wha.org/vv-07-07-2022/6)*

In 2012, however, a court was agreeable to an employer with the same type of scheduling that averaged employees weekly time and then applied that time to both on weeks and off weeks. It indicated that the regulations concerning intermittent and reduced schedule leave have restrictions, but not for leave taken on a continuous basis.

The employer calculated the employee's leave as follows:

- 12 (hours per day) x 7 (days per week) = 84 hours per week
- 82 ÷ 2 (weeks) = 42.
- 42 x 12 (weeks of FMLA leave) = 504 hours.

The employer gave the employee 504 hours of FMLA leave. (*Murphy v. John Christner Trucking, LLC*, 2012)

NO OVERTIME

Employees can, however, have conditions or caring obligations that limit them to working only eight-hour days, even if the work schedule calls for longer days. This is one area where administering FMLA leave can truly show its challenges.

Take, for example, a situation in which a nurse is assisting with an operation that began five hours into the nurse's shift and is expected to last three more hours. If the operation takes longer than expected, and is going to last past the nurse's eighth hour of work, the employer/hospital will have to figure out how balance the nurse's need for leave and the needs of the operation.

For this balancing act, there is no easy answer. Having someone step in might not be practicable, even if someone else who is appropriately accredited is available. Given the shortage, the chance that someone is available could be low.

COUNTING OVERTIME AS FMLA LEAVE

If an employee cannot work overtime, applying FMLA leave to the overtime hours not worked depends on whether the overtime is mandatory or voluntary. If it's mandatory, and an employee does not work it because of an FMLA-qualifying reason, then you count the overtime hours not worked as FMLA leave. If the overtime is voluntary, you would not count it as FMLA leave.

Clearly indicating whether overtime is mandatory or voluntary can help avoid any confusion.

INCLUDE OVERTIME IN CALCULATING INTERMITTENT LEAVE

Because health care employees tend to work a lot of overtime, employers need to understand that it could become part of an employee's regular workweek, particularly for purposes of intermittent leave.

Example: *If a nurse is scheduled to work only 40 hours per week, but regularly works 45, that employee would have 540 hours of intermittent FMLA leave, not 480.*

Also, all hours worked, including overtime hours, must be included in determining whether an employee has worked at least 1,250 hours in the 12 months for eligibility purposes.

Those 1,250 hours equates to about 104 hours per month, and only about 26 hours per week. Therefore, if a part-time employee who is scheduled to work only 25 hours per weeks works overtime, the employee could end up becoming eligible for FMLA leave.

ATTENDANCE AND CALL-IN POLICIES

Eligible employees may take FMLA leave, even when the leave is unforeseeable and intermittent. An employee could, for example, call in one day to report not being able to work. If the absence is for an FMLA-qualifying reason, the employee's job would be protected.

These sudden call-ins and their timing can be frustrating and can impact staff coverage. Again, health care employers need to balance the need for coverage with employee rights.

Employers may have call-in policies and procedures, and require that employees on FMLA leave adhere to them, unless unusual circumstances are involved. Employers may, for example, have a policy that requires employees to call-in at least one hour before the shift is to begin. The FMLA regulations cover situations if employees fail to follow your policy:

> "If an employee does not comply with the employer's usual notice and procedural requirements, and no unusual circumstances justify the failure to comply, FMLA-protected leave may be delayed or denied." 29 CFR 825.303(c)

Employees should be aware of such a policy. That's why employers often include a copy of the policy in an FMLA "packet" given to the employee when the employee puts the employer on notice of the need for leave.

Don't hold employees to the policy if unusual circumstances prevent the employee from complying. The FMLA regulations also speak to this:

> "However, if an employee requires emergency medical treatment, he or she would not be required to follow the call-in procedure until his or her condition is stabilized and he or she has access to, and is able to use, a phone." 29 CFR 825.303(c)

Therefore, handling FMLA call-ins can require individualized assessments.

Otherwise, employees may not be subject to negative employment actions because they exercise their FMLA rights. Doing so would risk a retaliation claim.

Often, employers want to transfer employees who take intermittent leave to other departments to help handle workloads. If, however, an employee is out due to an FMLA-qualifying reason, employers need to beware. They may transfer an employee on intermittent or reduced schedule leave only if that leave is foreseeable based on planned medical treatment for the employee or family member or if the employer agrees to intermittent or reduced schedule leave for bonding with a healthy child.

Yet, unforeseeable intermittent leave causes some of the most challenges employers face.

TIPS:

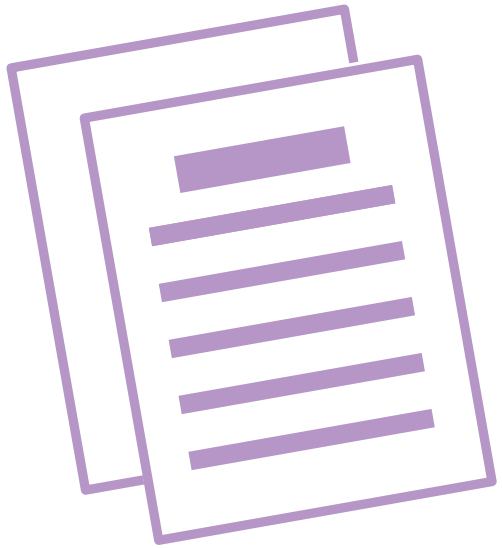
Train supervisors and managers so they are aware of how the FMLA applies in such situations.

Have a designated individual to handle FMLA leave to handle questions from employees and supervisors, and to maintain a process.

CASE IN POINT

Lindsey had been a strong-performing employee for 17 years when she needed FMLA leave. Even while on the leave, she voluntarily continued to perform some of her job responsibilities and told her coworkers to contact her if they needed anything. She also talked to David, her manager, via email and text about various work-related issues.

Shortly after she returned to work, Lindsey had a work process disagreement with a coworker. David responded by issuing a corrective action form that indicated he had received reports from other employees that Lindsey "wasn't at work" before she took leave several months earlier. The corrective action form did not, however, list any specific dates.



A few months later, Lindsey was issued a second corrective action form that indicated her attendance was beginning to slip again. This warning cited three specific incidents of Lindsey's absenteeism. The first was when David was unable to reach Lindsey by text message because she had left her phone on her desk while she was working elsewhere. The second was when Lindsey advised her secretary — but not David directly — that she would be out sick. The third was when some coworkers told David that they had been unable to locate Lindsey that morning; she was attending a training session.

Lindsey began to feel like she was being penalized because she took FMLA leave.

Soon thereafter, Lindsey was assigned a project that included monthly reports. She believed the due dates were suggestions, and she repeatedly provided the reports later than suggested.

David, his manager, and the company's HR manager met to discuss the situation and decided to terminate Lindsey. She sued.

Lindsey argued that she was terminated in retaliation for taking the FMLA leave, and the court found that she had produced enough evidence to conclude that the company's attendance-based justification for the termination was not the real reason. The court pointed to the following:

- ✓ Lindsey received her first disciplinary action in 17 years only three weeks after she took leave.
- ✓ The initial corrective action failed to list any dates that she missed work.
- ✓ The second corrective action listed only three incidents, and none of those were very convincing as Lindsey had reasons for the absences, from being sick to attending training.

In regard to the late reports, there was evidence indicating that the employer wouldn't have fired Lindsey for the missed deadlines alone. It did not point to any adverse impact that Lindsey's tardy reports had on the company. Rather, the termination documents focused on her attendance.

The court allowed the case to proceed.

The employer would likely have fared better had it not jumped the gun in terminating Lindsey, but looked at the big picture, including her work history. It might have given Lindsey corrective action for failing to timely submit the reports, instead of simply firing her. It also failed to follow its own progressive discipline policy.

Lindsey v. Bio-Medical Applications of Louisiana, L.L.C., 5th Circuit Court of Appeals, No. 20-30289, August 16, 2021.

Transferring an employee on FMLA leave

If the leave is based on planned medical treatment, the employer may require the employee to transfer temporarily, during the period that the intermittent or reduced leave schedule is required, to an available alternative position for which the employee is qualified and which better accommodates recurring periods of leave than does the employee's regular position.

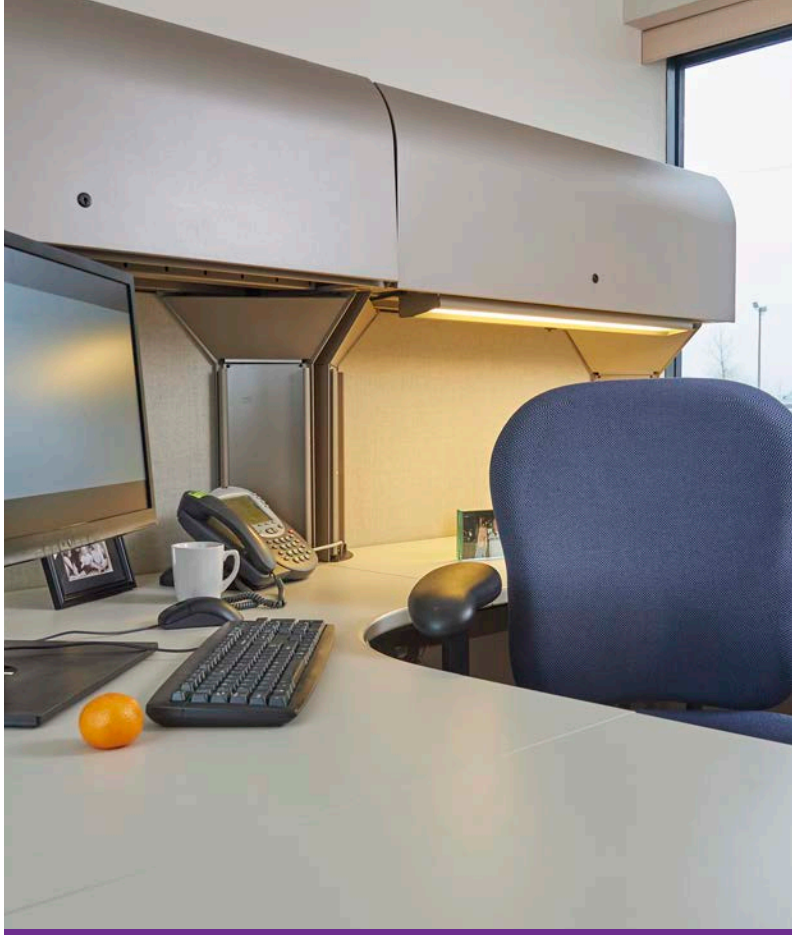
Employers may pay a lower wage to an employee transferred to a different position, but they would need to fully restore the employee when leave ends.

That unforeseeable, intermittent leave is also often the basis of FMLA leave abuse. Employers do, however, have some tools to help combat leave abuse.

CERTIFICATIONS/SECOND OPINIONS/RECERTIFICATIONS

In addition to enforcing leave policies, employers may request certifications when leave is taken for medical reasons. These should be reviewed carefully. While employers may not mandate that they include a diagnosis, the information included should help determine whether the leave qualifies for FMLA protections.

If there is reason to doubt a certification's validity, employers may ask for a second opinion. Employers pay for second opinions, but they could help determine whether an absence is protected and help send a message that FMLA leave abuse is taken seriously.



When allowed, request a recertification to support the ongoing need for leave. Employees pay for such certifications, so they have more invested in the process. Employers may request them every 30 days in relation to an absence, or when the minimum duration of the condition expires, whichever is later. Employers need not wait the 30 days or minimum duration in certain circumstances:

- The employee requests an extension of leave;
- Circumstances described by the previous certification have changed significantly (e.g., the duration or frequency of the absence, the nature or severity of the illness, complications); or
- The employer receives information that casts doubt upon the employee's stated reason for the absence or the continuing validity of the certification.

TREATMENT SCHEDULING

When planning medical treatment, employees must consult with the employer and make a reasonable effort to schedule the treatment so as not to disrupt unduly the employer's operations, subject to the approval of the health care provider.

Employees are ordinarily expected to consult with their employers prior to the scheduling of treatment in order to work out a treatment schedule which best suits the needs of both the employer and the employee.

If an employee who provides notice of the need to take FMLA leave on an intermittent basis for planned medical treatment fails to consult with the employer to make a reasonable effort to arrange the schedule of treatments so as not to unduly disrupt the employer's operations, the employer may talk to the employee and require the employee to attempt to make such arrangements, again, subject to the approval of the health care provider.

DOCKING PAY

The FMLA provides for job-protected, unpaid leave. While employees have the right to use their accrued paid time off (PTO), exempt employees might believe that, because they are paid on a salary basis, they must be paid their salary even if they take intermittent leave during a workweek. This is not necessarily true.

Employers may make deductions from an exempt employee's salary for any hours taken as intermittent or reduced FMLA leave within a workweek, without affecting the employee's exempt status.

TRACKING LEAVE

Keeping track of employees' use of FMLA leave can help you know when the 12-week entitlement will be exhausted. Tracking all of employee's time off, including vacation and other PTO can help determine if an employee might be abusing leave.

WATCHING FOR ABUSE

Employers don't need to be a detective to spot FMLA leave abuse, but some clues to watch for include the following:

- **Vacations.** If an employee takes vacation the same time every year and is turned down one year only to ask for FMLA leave for that same time period, be on the lookout to ensure that the reason for leave qualifies for FMLA protections.
- **Patterns.** Watch for suspicious patterns of absence, such as those occurring predominately on Fridays or Mondays, or before and after a holiday.
- **Timing.** If an employee has a condition or reason for leave that requires exactly 12 weeks of time off, this might be a clue that the employee knows just how long the FMLA protections last. Review the certification to ensure that the reason for the leave does qualify for such protections.
- **Absences.** If, during a discussion about an employee's excessive absences, the employee claims that at least some of the absences should have been FMLA leave, investigate. The employee could be trying to avoid discipline. The reason could, however, be a legitimate FMLA reason.
- **Feedback.** Listen to what other employees are saying about someone on leave. Coworkers can and do provide information about employees who were out on what was supposed to be FMLA leave, but saw the employee doing something contradictory to the certified reason for leave.
- **Surveillance.** If tools such as second opinions and recertifications have been exhausted, and an honest belief that an employee's reason for leave does not qualify remains, consider using a third party to perform surveillance on the employee.

RESPONDING TO SUSPECTED ABUSE

Steps taken in responding to suspected abuse should remind other employees of the repercussions at risk when abuse is discovered. Such steps might include the following:

- Open an investigation,
- Review all related records and documents,
- Talk to the employee and others who might be witness to suspicious behavior,
- Talk to the employee's manager to see if coworkers have been indicating suspicious behavior,
- Ask for a recertification to substantiate (or not) the suspicious leave pattern.

If an employee has obtained FMLA leave fraudulently, turn to your company policies regarding fraud. Employees who engage in such fraud do not have FMLA protections.

If the company FMLA policy does not already include it, consider adding a provision that fraudulent use of FMLA leave may result in discipline up to an including termination.

FMLA TRAINING

Because managers are on the front lines when employees need time off, one of the best ways to help make FMLA leave administration easier, is to ensure managers are appropriately trained.

Managers benefit from knowing what reasons qualify for FMLA leave, that employees may take the 12 weeks of leave on a continuous, intermittent, or reduced schedule basis, and how to recognize when an employee is providing notice of the need for leave.

Managers should know that, when an employee seeks leave for the first time for a potential FMLA-qualifying reason, the employee need not expressly assert rights under the FMLA or even mention the FMLA. Employees might not even know whether their absence qualifies for FMLA leave.

When, however, an employee seeks leave due to a qualifying reason for which the employer has previously provided the employee FMLA-protected leave, the employee must specifically reference either the qualifying reason for leave (e.g., "I'm having a migraine") or the need for FMLA leave. Calling in "sick" without providing more information is not enough notice to trigger an employer's FMLA obligations.

Employees can provide such notice in many ways. In one case, an employee's sleeping on the job was considered enough notice. In another, an employee's crying was. Simply saying that a condition is flaring up could be enough.

CASE IN POINT

During his handful of years with the company, Ed had some attendance issues to the point that, if he had two more unexcused tardies or one unexcused absence, he could be terminated.

A few months after that point, Ed applied for intermittent FMLA leave for depression and anxiety. He was asked to provide a certification supporting the leave, and he did. The certification indicated that Ed was unable to perform any duties during a flare-up, and that he would need three to four days of leave per month.

Ed received conflicting instructions from the employer about how to call in to use his intermittent FMLA leave. One set of instructions told him to call two numbers, seemingly both going to the company. Another set of instructions told him to call the company and the third-party administrator (TPA) that handled FMLA, but provided no identified phone number for the TPA. Ed was under the impression that he needed only to call one number, and the company would take it from there.

Ed missed work on December 6 and 7, and was late on December 8. He called in each time, saying he was having a flare-up or that he'd been sick. All of these incidents were categorized as unexcused and not coded as FMLA due to confusion about when Ed had called in and notes about the incidents. Because of the coding, the TPA couldn't apply the incidents to Ed's FMLA claim, in part because Ed didn't say "FMLA" when he called in.

In January, Ed was terminated due to his absences. He sued claiming that the company interfered with his FMLA rights because they didn't classify his absences as FMLA leave, and then retaliated against him for exercising those rights when they fired him.

The lower court found in favor of the employer, claiming that Ed didn't give sufficient notice of his absences and tardies. The appeals court, however, disagreed, indicating that Ed's condition was known, and that it was foreseeable that he would have flare-ups, but Ed could not predict when those flare-ups would happen.

Ed did not need to provide formal "notice" each and every time he called in to use his FMLA leave. The court even indicated that Ed didn't have to specifically reference the reason for the leave or the need for FMLA leave, since he had already given formal notice of his condition.

Ed needed only to say he was having a flare up or that he didn't feel good or that he had been sick. The certification indicated that he would need FMLA leave for flare-ups, so his reference to flare-ups was enough when he called in. Since Ed provided such notice, the company interfered with his FMLA rights when it terminated him for taking FMLA leave.

When it came to the company's call-in procedures, the court indicated that Ed couldn't be faulted for failing to comply with the company's unclear procedure.

Render v. FCA US, LLC, Sixth Circuit Court of Appeals, No. 21-2851, November 16, 2022.

BEWARE THE THREE-HEADED MONSTER: FMLA/WORKERS' COMP/ADA

Occupational injuries and illnesses can be common in the health care industry. State workers' compensation laws apply to such occupational conditions. Even so, leave taken because of such occupational conditions could also fall under the FMLA.

Workers' compensation and the FMLA provide for different benefits. Workers' compensation provides for health care and income replacement, while the FMLA provides for unpaid, job-protected leave and the continuation of group health care coverage while on leave.

Therefore, an employee who experiences an occupational injury or illness could also have FMLA protections.

If an employee exhausts the 12 weeks of FMLA leave taken for his or her own condition and still needs more time off, employers need to consider their obligations under the federal Americans with Disabilities Act (ADA).

The ADA requires employers to provide reasonable accommodations to the known disability of an employee (or applicant). Giving more leave beyond the 12 weeks of FMLA leave has been seen as a reasonable accommodation under the ADA. How much leave is reasonable will generally depend upon how much would pose an undue hardship. Employers need not provide an accommodation that would pose such a hardship.

Employees could have protections under workers' compensation, the ADA, and the FMLA all at once.

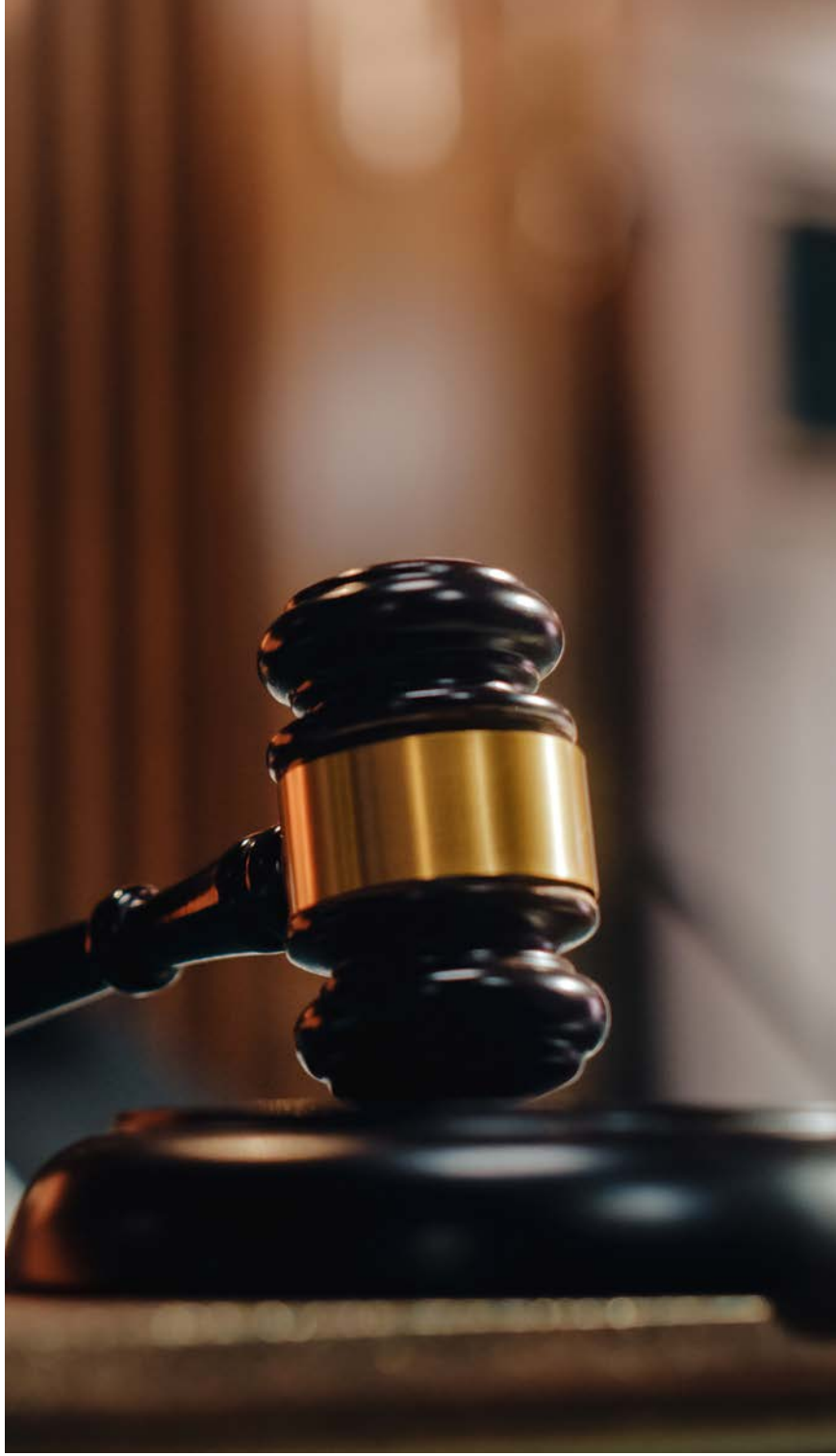
STATE LAWS

Obviously, the FMLA does not exist in a vacuum. Almost all states have some form of employee leave law, and more and more are enacting paid leave laws. For employers with employees in multiple states, keeping on top of such changes and administering leave can be a challenge.

Employers must be familiar with and apply the provisions of each law that gives the greatest benefit to employees. Often, one law does not supersede another entire law. Each provision of each law must be reviewed.

SUMMARY

Everyone needs medical care at some point, and medical professionals will need time off. Balancing the needs of the health care system with the requirements of the Family and Medical Leave Act poses unique challenges, often exacerbated by a shortage of health care professionals. Add to that the ever-changing state leave laws, and it's easy to see why medical appointments often need to be rescheduled.



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ABOUT THE AUTHOR

DARLENE M. CLABAULT, PHR, SHRM-CP, CLMS, J. J. KELLER & ASSOCIATES, INC.

Darlene M. Clabault, PHR, is an editor on the Human Resources Publishing Team. She has written manuals on the Americans with Disabilities Act (ADA), the Family and Medical Leave Act (FMLA) and the Essentials of Employment Law. She researches and assists HR professionals in their understanding of their statutory and regulatory requirements. Darlene has authored articles for industry publications and speaks at SHRM and other events. She holds a SHRM-CP, PHR , and CLMS certification, is a member of the Society for Human Resource Management (SHRM), and of the local SHRM chapter.

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